

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
The Region 22 700 MHz Plan Filing	)	WT Docket No. 02-378
	)	
	)	
To: The Commission	)	
	)	

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF REGIONAL PLANNING COMMITTEES**

The National Association of Regional Planning Committees hereby provides comments in support of the Region 22 (Minnesota) 700 MHz plan filed with the Commission on October 14, 2005.

The National Association of Regional Planning Committees (NARPC) is an incorporated Mutual Benefit Non-Profit Organization (NPO) that serves as an advocate for Federal Communications Commission designated Public Safety 700 and 800 MHz Regional Planning Committees. The NARPC acts as an integrated voice for the national regional planning community providing a forum for outreach and initiatives while promoting the continuance of a heightened inter-regional planning dialogue within the volunteer-based regional planning community. The NARPC feels the sustained level of support and cooperation it has received from the regional planning community for its advocacy is an indication that a public safety need is being met and looks forward to expanding its working relationship with regional planning groups throughout the nation. The NARPC encourages each region to work collaboratively in an open forum to promote *their region's* user participation while working toward achieving their spectrum management and regional planning goals.

The Region 22 700 MHz plan filed with the FCC on October 14, 2005 along with the supplemental information since provided to the Commission, appears to be in the best interest of public safety in both Region 22 and the surrounding regions.

Documentation shows that Region 22 has convened and held an open, inclusive planning process that has led to the creation and the region arriving at consensus with regard to their 700 MHz plan and the end result appears to meet the regions public safety communications needs. They have provided the Commission with documentation of their outreach efforts and it is apparent that an effort to include all interested parties during the process was made. While Region 22 has not been

able to obtain written concurrence from Region 32 and Region 38 due to those regions not having convened 700 MHz regional planning committees, it appears that Region 22 has made substantial efforts to reach out and work with representatives of the unformed regions to ensure a degree of consistency at their regional borders and to heighten user awareness, to the degree possible, in the unformed regions. Region 22 also indicates that they anticipate obtaining written concurrence and inter-regional dispute resolution documents from Region 32 and

Region 38 after those regions convene. The NARPC feels Region 22 has been diligent in its plan development and that their request for waiving Rule 90.527 (a) (5) is with merit.

Another indication that Region 22's plan has kept in mind the needs of Region 32 and Region 38 is by using the National Law Enforcement Corrections Technology Center (NLECTC) sponsored CAPRAD database. The CAPRAD channel allotments used by Region 22 at their border areas will provide sufficient channel availability to the unformed regions and ensure that users in the unformed regions will have availability to 700 MHz spectrum. This channel packing plan takes into account criteria and was developed to create maximum channel availability in a region while maximizing channel re-use for just this type of situation. Too often in previous regional planning efforts regions that had their plans completed early in the process were able to utilize a greater percentage of the available spectrum and regions that developed later were forced to plan with less resources. The use of the CAPRAD packing plan by Region 22 is an indication that Region 22 has considered the needs of their bordering regions 700 MHz public safety channel availability and future planning. Region 22 has also taken time to allot wideband 50 KHz data channels into each county.

The NARPC supports the approval of the Region 22 700 MHz plan and the request for waiving Rule 90.527 (a) (5) due to the lack of a 700 MHz regional planning committee being convened in Regions 32 and 38. As other requests for waiver of Rule 90.527 (a) (5) may arise in the future, the NARPC feels the Commission should address each of these requests individually, assuring that planning has been made to ensure channel availability for future planners in the unformed regions.

## Committees

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